

Mr. Jim Inhofe  
Engineering Manager, Steel Division  
Continental Industries, Inc.  
4102 South 74th East Avenue  
Tulsa, Oklahoma 74145

Dear Mr. Inhofe:

This is in response to your letter of September 1, 1972, requesting clarification of the marking requirements of Section 192.63 as they apply to your products. In your letter you have indicated, in a very general way, the broad range of products you manufacture. Your questions are answered as follows:

Q. 1. Does the marking have to be on the product or may it be on the package the product comes in?

Answer: The regulation requires that material be marked as prescribed either in the specification or standard to which it was manufactured or in MSS Standard Practice SP-25. These referenced standards should thus cover in any specific case whether the marking or to be placed on the product or on the package. The intent of the regulation is that the product be clearly identified from point of manufacture to installation. In general, a marking on a package would not serve to identify a product out of the package prior to installation.

Q.2. If the marking must be on the product, is a stick-on label satisfactory, or should the marking be permanent?

Answer: The regulation and intent as explained in Answer 1 also apply here. Where a stick-on label could be removed by the detrimental action of environment, rough handling, or other conditions, prior to installation, such label would not provide satisfactory marking.

Q. 3. Must the product be marked to indicate pressure rating?

Answer: The standards referenced in Section 192.63 would provide the requirement in a specific case. In general, an acceptable mark will indicate pressure rating. However, it would be satisfactory if the mark identified the product in such a way that reference could be made to a readily available catalog or code containing the pressure rating.

Q. 4. Must the product be marked to indicate size?

Answer: The standards referenced in Section 192.63 would provide the requirement in a specific case. In general, if a marking as to size is required for the safe use of a product, then acceptable marking will include the indication of size.

Q. 5. If the answer to #4 is yes, should all inlet/outlet sizes be shown or just marking of basic size?

Answer: The answer to question 4 applies to each inlet/

We would be please to respond if you have questions with regard to the marking of any specific product you manufacture.

Sincerely,

/signed/

Joseph C. Caldwell  
Director  
Office of Pipeline Safety